

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE; DR.  
ANDREA WESLEY; DR. JOSEPH WESLEY;  
ROBERT EVANS; GARY FREDERICKS;  
PAMELA HAMNER; BARBARA FINN; OTHO  
BARNES; SHIRLINDA ROBERTSON; SANDRA  
SMITH; DEBORAH HULITT; RODESTA  
TUMBLIN; DR. KIA JONES; MARCELEAN  
ARRINGTON; VICTORIA ROBERTSON,

*Plaintiffs,*

vs.

STATE BOARD OF ELECTION  
COMMISSIONERS; TATE REEVES, *in his official  
capacity as Governor of Mississippi*; LYNN FITCH,  
*in her official capacity as Attorney General of  
Mississippi*; MICHAEL WATSON, *in his official  
capacity as Secretary of State of Mississippi*,

*Defendants,*

AND

MISSISSIPPI REPUBLICAN EXECUTIVE  
COMMITTEE,

*Intervenor-Defendant.*

**CIVIL ACTION NO.  
3:22-cv-734-DPJ-HSO-LHS**

**PLAINTIFFS' UNOPPOSED MOTION FOR A SUSPENSION OF  
THE DEADLINE TO FILE A PETITION FOR AWARD OF ATTORNEYS' FEES**

Plaintiffs Mississippi State Conference of the National Association for the Advancement of Colored People, Dr. Andrea Wesley, Dr. Joseph Wesley, Robert Evans, Gary Fredericks, Pamela Hamner, Barbara Finn, Otho Barnes, Shirlinda Robertson, Sandra Smith, Deborah Hulitt, Rodesta Tumblin, Dr. Kia Jones, Marcelean Arrington, and Victoria Robertson ("Plaintiffs")

respectfully move for a suspension of the deadline to file a petition for an award of attorneys' fees and costs until 30 days after the recently filed appeals have been resolved. The current deadline for the fees motion is July 14, 2025. The State Defendants and the Intervenor-Defendant do not oppose the relief requested in this motion.

On May 7, 2025, this Court entered a final judgment in favor of Plaintiffs and against Defendants. ECF No. 263. Plaintiffs intend to move this Court for attorneys' fees and costs incurred in this action pursuant to Federal Rule of Civil Procedure 54(d)(2)(b), 52 U.S.C. § 10310, and 42 U.S.C. § 1988. Under Federal Rules 6 and 54, the Court is empowered to set, revise, and extend the date by which motions for attorneys' fees must be filed. On May 12, Plaintiffs filed an unopposed motion to extend the default deadline, ECF No. 264, which this Court granted on May 14, setting the deadline for 60 days from the date of the Court's order. Today, the State Defendants and Intervenor Defendant filed notices of appeal. *See* State Defs.' Notice of Appeal, ECF No. 265 (S.D. Miss. July 3, 2025); Intervenor-Def.'s Notice of Appeal, ECF No. 267 (S.D. Miss July 3, 2025). Plaintiffs now request that the deadline for the fees motion be suspended during the pendency of these appeals.

The requested relief is consistent with Rule 54(d)(2), which states that a court order may dictate the timing of a motion for attorney's fees, and with Local Rule 7(b)(4), which permits parties to seek extensions of time in writing from the court. Further, there is good cause for the Court to grant Plaintiffs' request. In particular, there will now necessarily be additional legal work performed by Plaintiffs' counsel in the future on this matter. As such, suspending the deadline to file the fees motion pending the resolution of the appeals would—consistent with Rule 1—promote judicial economy by allowing all fee and cost issues to be resolved at one single time, after the conclusion of the appellate process (and any subsequent litigation).

Accordingly, Plaintiffs request that this Court grant this unopposed motion and suspend the current deadline for the filing of a motion for attorneys' fees and costs until 30 days after the resolution of the noticed appeals. Plaintiffs further respectfully request that the requirement of a separate memorandum of law under Local Rule 7(b)(4) be waived for this short, unopposed motion.

Respectfully submitted,

This the Third Day of July, 2025.

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**CERTIFICATE OF SERVICE**

I, Ari Savitzky, do certify that on this day I caused to be served a true and correct copy of the foregoing by electronic mail to all counsel of record.

This the Third Day of July, 2025.

/s/ Ari J. Savitzky  
Ari J. Savitzky